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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91268640
Party	Defendant Microsystem Technologies
Correspondence Address	MICROSYSTEM TECHNOLOGIES 7450 CHAPMAN HWY, NO. 321 KNOXVILLE, TN 37920 UNITED STATES Primary Email: contact@mstmicro.com Secondary Email(s): george@mstmicro.com No phone number provided.
Submission	Answer
Filer's Name	George L. Babec
Filer's email	george@mstmicro.com
Signature	/George L. Babec/
Date	04/12/2021
Attachments	MSTAnswer.pdf(150783 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,)
0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Opposition No. 91268640
Opposer, v.)) Serial No. 90/063,091
MICROSYSTEM TECHNOLOGIES)) Mark: MICRONATIC
Applicant.)) Published in the Official Gazette or
)) March 16, 2021

ANSWER TO NOTICE OF OPPOSITION

Applicant Microsystem Technologies ("Applicant") hereby answers the notice of opposition of Opposer Micron Technology, Inc., ("Opposer") as following. All allegations not specifically admitted herein are denied.

- Applicant denies the allegations in the first, unnumbered paragraph.
- 1. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 1.
- 2. Applicant admits the allegations in Paragraph 2.
- 3. Applicant admits the allegations in Paragraph 3.
- 4. Applicant admits the allegations in Paragraph 4.
- 5. Applicant admits the allegations in Paragraph 5.
- 6. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 6.
- 7. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 7.
- 8. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 8.

- 9. Applicant is in agreement with the information in Paragraph 9.
- 10. Applicant is in agreement with the information in Paragraph 10.
- 11. Applicant is without sufficient knowledge or information to admit or deny allegations in Paragraph 11.
- 12. Applicant denies the allegations in Paragraph 12. No likelihood of confusion exists between Applicant's use of its MICRONATIC mark and Opposer's use of its MICRON Marks. The pending Mirconatic mark is dissimilar to the Micron mark in both appearance, sound, connotation and commercial impression. The Micronatic Logo differs substantially such that it could not be misinterpreted. The product lines represented by the Micronatic Brand are not in competition with Micron in any way. The Micronatic Brand is primarily for add-on items for technical book publications and for prototyping purposes for Electronic Hobbyists and Engineers desiring to learn through the means of a printed publication, eBook, Blog Post, or Magazine Article. This has been the business model of Microsystem Technologies since 1995. The creation of the 'Micro'natic mark is keeping with the naming conventions used by 'Micro'system Technologies, and MST'Micro' Publishing (U.S. serial number: 87108046) that is a publishing imprint of Microsystem Technologies. There was no intent to associate the Micronatic Mark with the Micron Mark in any way.
- 13. Applicant denies the allegations in Paragraph 13.
- 14. Applicant denies the allegations in Paragraph 14.
- 15. Applicant denies the allegations in Paragraph 15.

Respectfully submitted, Dated: April 12, 2021